

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-79 THROUGH 81**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated September 26, 2011. Each interrogatory is stated verbatim and followed by the response. A response to DBP/USPS-82 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 21, 2011

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-79 Please refer to your response to Interrogatory DBP/USPS-74 subpart [b].

[a] Please confirm that it is the policy of the Postal Service when providing a spreadsheet as part of a PRC pleading that all of the data that appears on a specific horizontal line in that spreadsheet will refer to the same activity.

[b] If you are unable to confirm subpart [a] of this interrogatory, please explain whether the Postal Service believes that it could be confusing to the recipient of a spreadsheet to have data on the same horizontal line refer to different activities particularly when there is no indication of this in the spreadsheet.

[c] Please advise whether you believe that it could be misleading to show Northern New Jersey in the same horizontal line as three facilities that are not in that district regardless of the method used for sorting the data.

[d] Please advise why the Postal Service is not correcting the spreadsheet so that data that appears on the same horizontal line will refer to the same activity.

RESPONSE

(a) The Postal Service has no policy that addresses this issue.

However, the question does describe an objective that is vigorously, albeit imperfectly pursued by those who act on behalf of the Postal Service.

(b) The Postal Service has not conducted sufficient analysis to form a belief as to whether, in a spreadsheet, the inadvertent immaterial horizontal misalignment in the presentation of a sliver of extraneous data having no bearing on the core purposes of the docket in which it is filed could confuse someone focused on the material issues in this docket, but concedes the possibility of such a result.

(c) The suggestion that one has been misled implies intent on the part of another to have done so. Since no such intent exists in reference to

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RESPONSE to DBP/USPS-79 (continued)

the subject of this interrogatory, please see the response to subpart (b).

- (d) The Postal Service is of the view that the trivial misalignment that is the focus of this interrogatory has no material bearing on the ability of the Commission to issue an advisory opinion addressing the numerous material issues raised by the Request of the Postal Service and, as amply demonstrated by the conduct of the other parties in this docket, has no bearing on their ability to focus on those issues, examine the evidence and offer their views to the Commission.

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DBP/USPS-80 Please refer to your response to Interrogatory DBP/USPS-74 subpart [c].

- [a] Please provide the criteria used to assign a CAG level between A and G and between H and J since they have the same revenue units.
- [b] Please advise the types of revenue that are utilized and the types that are not utilized in determining the number of \$387.55 revenue units a given office will have.
- [c] Please confirm or explain that the revenue from all stations and branches will be combined together with that of the main facility to arrive at a total revenue value.

RESPONSE

(a)

CAG	Revenue Units FROM	Through
A	356,250 and over	
B	118,750	356,249
C	23,750	118,749
D	11,875	23,749
E	4,750	11,874
F	2,150	4,749
G	950	2,149
H	430	949
J	190	429
K	36	189
L	UP Through	35

The revenue unit for Fiscal Year 2010 is \$387.55. This is the average revenue for 1,000 pieces of revenue-generating mail and special services transactions. The revenue unit is used in the process of determining the proper cost ascertainment group (CAG) for Post Offices.

- (b) Both commercial and retail are used.
- (c) Commercial and retail revenue (operating revenue) from all stations and branches are combined to produce the Office CAG.

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DBP/USPS-81 Please refer to your response to Interrogatory DBP/USPS-64 subpart [b] If there is no significance to this entry, why is it there?

RESPONSE

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